

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Shawn McNamee Debtor Andrea E. McNamee Joint-Debtor  SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of Dwelling Series IV Trust Movant v.  Shawn McNamee - Debtor Andrea E. McNamee - Joint-Debtor Kenneth E. West - Trustee Respondents	CASE NO.: 19-17731-amc  CHAPTER 13  JUDGE: Ashely M. Chan
---	---

**CERTIFICATION OF DEFAULT**

FRIEDMAN VARTOLO, LLP, attorneys for Movant, hereby certifies that the above-captioned Debtor has failed to comply with the terms of the Stipulation approved by the U.S. Bankruptcy Judge Ashely M. Chan on April 21, 2022. A copy of the Stipulation is attached hereto as **Exhibit "A"**. Movant certifies that the required Notice of Default required by the Order was sent to Debtor and Debtor's attorney on July 11, 2024 and Debtor has failed to cure the default. A copy of the Notice of Default is attached hereto as **Exhibit "B"**. In accordance with the terms of said Stipulation agreed to by the parties, the Automatic Stay is hereby lifted as to permit Movant to proceed with their State Court remedies upon Debtor's property.

Dated: August 1, 2024

By: /s/ Lauren M. Moyer  
Lauren M. Moyer, Esq.  
FRIEDMAN VARTOLO LLP  
Attorneys for Movant  
1325 Franklin Avenue, Suite 230  
Garden City, New York 11530  
T: (212) 471-5100  
F: (212) 471-5150  
Bankruptcy@FriedmanVartolo.com